



State of Utah

GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

Department of
Environmental Quality

Alan Matheson
Executive Director

DIVISION OF WATER QUALITY
Walter L. Baker, P.E.
Director

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Mike
RECEIVED

MAY 26 2016

DIV. OF OIL, GAS & MINING

MAY 24 2016

Mr. Scott A. Bakken, PG
Director, Permitting and Environmental Affairs
Energy Fuels
225 Union Blvd., Suite 600
Lakewood, CO 80228

Dear Mr. Bakken:

Subject: Site Review and Inspection of the Rim Mine complex located near Monticello, Utah on April 05, 2016, UPDES Permit Number UT0023922.

I appreciated meeting with you, Race Fisher, Mike Neumann, Andrea Riether, and Todd Eldredge on April 05, 2016. The SWPPP was updated in November 2006 and was complete. The mine currently was not in operation. Storm water controls are located throughout the facility including several detention ponds and berms to control and direct storm water on the property. Drainage ditches have also been installed to control storm water from coming in contact with raw product or industrial activities. See attached photos and inspection report. There were no deficiencies observed and no response is required at this time.

If you have any questions concerning the report do not hesitate to contact me at (801) 536-4393. Thank you.

Sincerely,

Mike George, Environmental Scientist
UPDES Storm Water Section

MG:nf

Enclosures(4):
1. RI 3560 (DWQ-2016-00963)
2. SW 3560 (DWQ-2016-009695)
2. Inspection report (DWQ-2016-009694)
3. Photos (DWQ-2016-00962)

cc: Rick Meyer, Environmental Health Director, San Juan County Public Health Dept., w/encl.
Mike Bradley, Division of Oil, Gas and Mining, w/encl.

DWQ-2016-009691



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., ICIS)

Transaction Code

N

NPDES

U T 0 0 2 3 9 2 2

yr/mo/day

1 6 0 4 0 5

Inspection Type

R

Inspector

2

Fac. Type

Remarks

Inspection Work Days

0 0 1

Facility Self-Monitoring Evaluation Rating

5

BI

N

QA

N

Reserved

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)

Rim Mine

San Juan County, Utah, Section 29 Township 31 South, Range 25 East Outfall 001 Coordinates: N38 03 51 latitude and W109 12 15 longitude

Entry Time/ Date

09:00am
04/05/2016

Permit Effective Date

08/01/2011

Exit Time/ Date

11:00am
04/05/2016

Permit Expiration Date

12/31/2015
Administratively Extended

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Race Fisher, Mike Neumann, Scott Bakken, Andrea Reither, and Todd Eldredge
(970)739-5742 (970) 620-0749 (303)720-5330 (303)601-7457 (435)459-1075

Other Facility Data (e.g., SIC NAICS, and other descriptive information)

SIC : 1094 - Uranium-Radium-Vanadium Ores

NAICS : 21229 - Other Metal Ore Mining

Name, Address of Responsible Official/Title/Phone and Fax Number

Scott A. Bakken
225 Union Boulevard, Suite 600
Lakewood, CO 80228
(303) 389-4132

Contacted

☒

Yes

☐

No

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

- | | | | |
|--|---|--|------------------------------|
| <input type="checkbox"/> Permit | <input type="checkbox"/> Self Monitoring Program | <input type="checkbox"/> Pretreatment | <input type="checkbox"/> MS4 |
| <input type="checkbox"/> Records/Reports | <input type="checkbox"/> Compliance Schedule | <input type="checkbox"/> Pollution Prevention | |
| <input checked="" type="checkbox"/> Facility Site Review | <input type="checkbox"/> Laboratory | <input checked="" type="checkbox"/> Storm Water | |
| <input type="checkbox"/> Effluent/Receiving Waters | <input type="checkbox"/> Operations & Maintenance | <input type="checkbox"/> Combined Sewer Overflow | |
| <input type="checkbox"/> Flow Measurement | <input type="checkbox"/> Sludge Handling/Disposal | <input type="checkbox"/> Sanitary Sewer Overflow | |

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes

SEV Description

Name(s) and Signature(s) of Inspector(s)

Mike George

Agency/Office/Phone and Fax Number(s)

Division of Water Quality
(801) 536-4393

Date:

5-23-16

Name and Signature of Management Q A Reviewer

Jeff Studenka, Manager
Storm Water Section

Agency/Office/Phone and Fax Number(s)

Division of Water Quality
(801) 536-4395

Date:

5-24-16

INSTRUCTIONS

Section A: National Data System Coding (i.e., ICIS)

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	X Toxics Inspection	6 IU Non-Sampling Inspection with Pretreatment
B Compliance Biomonitoring	Z Sludge - Biosolids	7 IU Toxics with Pretreatment
C Compliance Evaluation (non-sampling)	# Combined Sewer Overflow-Sampling	! Pretreatment Compliance (Oversight)@ Follow-up (enforcement)
D Diagnostic	\$ Combined Sewer Overflow-Non-Sampling	{ Storm Water-Construction-Sampling
F Pretreatment (Follow-up)	+ Sanitary Sewer Overflow-Sampling	} Storm Water-Construction-Non-Sampling
G Pretreatment (Audit)	& Sanitary Sewer Overflow-Non-Sampling	: Storm Water-Non-Construction-Sampling
I Industrial User (IU) Inspection	\ CAFO-Sampling	~ Storm Water-Non-Construction-Non-Sampling
J Complaints	= CAFO-Non-Sampling	< Storm Water-MS4-Sampling
M Multimedia	2 IU Sampling Inspection	- Storm Water-MS4-Non-Sampling
N Spill	3 IU Non-Sampling Inspection	> Storm Water-MS4-Audit
O Compliance Evaluation (Oversight)	4 IU Toxics Inspection	
P Pretreatment Compliance Inspection	5 IU Sampling Inspection with Pretreatment	
R Reconnaissance		
S Compliance Sampling		
U IU Inspection with Pretreatment Audit		

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A- State (Contractor)	O- Other Inspectors, Federal/EPA (Specify in Remarks columns)
B- EPA (Contractor)	P- Other Inspectors, State (Specify in Remarks columns)
E- Corps of Engineers	R- EPA Regional Inspector
J- Joint EPA/State Inspectors—EPA Lead	S- State Inspector
L- Local Health Department (State)	T- Joint State/EPA Inspectors—State lead
N- NEIC Inspectors	

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1- Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2- Industrial. Other than municipal, agricultural, and Federal facilities.
- 3- Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4- Federal. Facilities identified as Federal by the EPA Regional Office.
- 5- Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.



United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., ICIS)

Transaction Code N	NPDES U T 0 0 2 3 9 2 2	yr/mo/day 1 6 0 4 0 5	Inspection Type ~	Inspector 2	Fac. Type 20
1	2	3	11	12	17
Remarks					
21					
Inspection Work Days 0 0 1	Facility Self-Monitoring Evaluation Rating 5	BI N	QA N	Reserved	
67	69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Rim Mine San Juan County, Utah, Section 29 Township 31 South, Range 25 East Outfall 001 Coordinates: N38 03 51 latitude and W109 12 15 longitude	Entry Time/ Date 09:00am 04/05/2016	Permit Effective Date 08/01/2011
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Race Fisher, Mike Neumann, Scott Bakken, Andrea Reither, and Todd Eldredge (970)739-5742 (970) 620-0749 (303)720-5330 (303)601-7457 (435)459-1075	Exit Time/ Date 11:00am 04/05/2016	Permit Expiration Date 12/31/2015 Administratively Extended
Name, Address of Responsible Official/Title/Phone and Fax Number Scott A. Bakken 225 Union Boulevard, Suite 600 Lakewood, CO 80228 (303) 389-4132	Other Facility Data (e.g., SIC NAICS, and other descriptive information) SIC : 1094 - Uranium-Radium-Vanadium Ores NAICS : 21229 - Other Metal Ore Mining	
Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

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SEV Codes	SEV Description
<input type="checkbox"/>	
<input type="checkbox"/>	
<input type="checkbox"/>	
<input type="checkbox"/>	

Name(s) and Signature(s) of Inspector(s) Mike George 	Agency/Office/Phone and Fax Number(s) Division of Water Quality (801) 536-4393	Date: 5-23-16
Name and Signature of Management Q A Reviewer Jeff Studenka, Manager Storm Water Section 	Agency/Office/Phone and Fax Number(s) Division of Water Quality (801) 536-4395	Date: 5-24-16

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INSPECTION PROTOCOL

UPDES Permit #: UT0023922 – Energy Fuels Resources, Rim Mine
Inspection Type: Reconnaissance Inspection
Inspection Date: April 04, 2016

On April 05, 2016 Mike George of the Division of Water Quality (DWQ) met with Race Fisher, Andrea Reither, Mike Neumann, Scott Bakken and Todd Eldredge of the Rim Mine. The purpose and scope of the inspection were explained and a facility overview was conducted and reporting and recordkeeping requirements of the UPDES permit were reviewed. The permit is currently up for public comments.

FACILITY DESCRIPTION

Location: Rim Mine
San Juan County, Utah, Section 29 Township 31 South, Range 25 East
Outfall 001 Coordinates: N38° 03' 51" latitude and W109° 12' 16" longitude.

Average Flow: Intermitting discharge, not flowing at time of inspection.

Receiving waters: Unnamed Dry Wash → East Canyon Wash → Hatch Wash

Process: The Rim Mine is a Uranium Mine that is in the process of dewatering the mine. Mine water is pumped to a clay lined holding pond, and then through a shed where barium chloride is added to initiate precipitation to aid in the removal of radium. The water then flows to a second clay lined pond where the radium removal takes place. The discharge is to an unnamed dry wash. At the time of inspection no discharge was occurring.

INSPECTION SUMMARY

There were no deficiencies noted during the previous inspections for follow up.

DEFICIENCIES

No deficiencies with respect to the UPDES permit were noted during the inspection.

REQUIREMENTS

None.

RECOMMENDATIONS

None.

Energy Fuels- Rim Mine



1. Office



2. Warehouse



3. Main Shaft



4. Detention Basin



5. Detention Basin



6. Access Road



7. Truck Staging Area



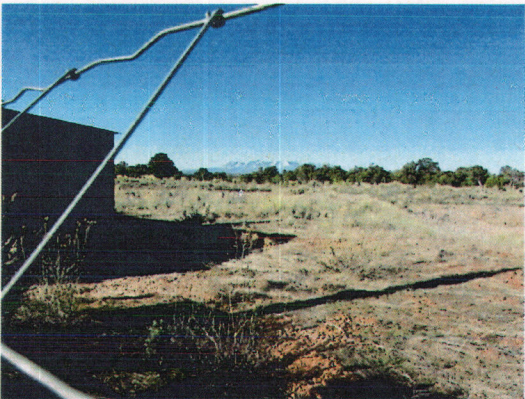
8. Berm



9. Treatment Plant



10. Storm Water Pond



11. Treatment Plant Area



12. Shaft Facing North



13. Hoist



14. Storm Water Detention Pond (Rock Stockpile)



15. Waste Rock Pile



16. Waste Rock Pile and Storm Water Pond



17. Berm below Rock Stockpile